

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA**

**ACTION NC,
DEMOCRACY NORTH CAROLINA,
NORTH CAROLINA A. PHILIP
RANDOLPH INSTITUTE,
SHERRY DENISE HOLVERSON,
ISABEL NAJERA, and
ALEXANDRIA MARIE LANE,**

Plaintiffs,

v.

KIM WESTBROOK STRACH,
*in her official capacity as Executive
Director of the North Carolina State Board
of Elections,*

RICK BRAJER,
*in his official capacity as Secretary of the
North Carolina Department of Health and
Human Services,*

KELLY THOMAS,
*in his official capacity as Commissioner of
the North Carolina Division of Motor
Vehicles, and*

NICK TENNYSON,
*in his official capacity as Secretary of the
North Carolina Department of
Transportation,*

Defendants.

Civil Action No. 1:15-cv-01063-LCB-JLW

ORAL ARGUMENT REQUESTED

**PLAINTIFFS' NOTICE OF MOTION AND MOTION
FOR PRELIMINARY INJUNCTION**

Plaintiffs Action NC, Democracy North Carolina, North Carolina A Philip Randolph Institute, Sherry Denise Holverson, Isabel Najera, and Alexandria Marie Lane (collectively, “Plaintiffs”), through their undersigned counsel, hereby move the Court for a preliminary injunction requiring Defendants to protect the voters of North Carolina and comply with Sections 5 and 7 of the National Voter Registration Act of 1993, 52 U.S.C. § 20501 et seq. (“NVRA”), and to take measures to remedy past and preclude future violations of the law.

In support hereof, this motion is based on this notice of motion and motion, memorandum of points and authorities, the pleadings and papers on file herein, such other argument and evidence as may be presented to the Court at a hearing on the motion, and the declarations of Christopher Butler (“Butler Decl.”), Pamela Cataldo (“Cataldo Decl.”), Matthew M. D’Amore (“D’Amore Decl.”), Colline Ferrier (“Ferrier Decl.”), Catherine M. Flanagan (“Flanagan Decl.”), Robert Hall (“Hall Decl.”), Sherry Denise Holverson (“Holverson Decl.”), Juliette Muniz Lafargue (“Lafargue Decl.”), Alexandria Marie Lane (“Lane Decl.”), Alexander P. McCoy (“McCoy Decl.”), Melvin Montford (“Montford Decl.”), Isabel Najera (“Najera Decl.”), and Emily Seawell (“Seawell Decl.”).

WHEREFORE, Plaintiffs respectfully request that this Court approve their requested motion for a preliminary injunction. A proposed order is attached hereto as Exhibit A.

Dated: March 21, 2016

Respectfully submitted,

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Counsel for All Plaintiffs

* Appearing pursuant to local rule 83.1(d).

CERTIFICATE OF SERVICE

I hereby certify that on this date, I have electronically filed Plaintiffs' Notice of Motion and Motion for Preliminary Injunction with the Court using the CM/ECF system, which will send electronic notification to the following:

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*Counsel for Defendants Rick Brajer,
Kelly Thomas, and Nick Tennyson*

Dated this 21st day of March, 2016.

By: /s/ Matthew M. D'Amore